

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

STACY ARNOLD,

Plaintiff,

v.

Case No. 5:19-CV-06137-BP

CITY OF ST. JOSEPH, ST. JOSEPH
PUBLIC LIBRARY and OFFICER
REBECCA HAILEY,

Defendants.

DECLARATION OF MARYANN KNORR

COMES NOW, Maryann Knorr, upon her oath and upon penalty of perjury, and states as follows:

1. I am above the age of 18, have personal knowledge of the facts contained in this declaration, and am competent to testify as to the facts stated herein.
2. I am a Technical Services Specialist for the East Hills Library, a library within the St. Joseph Public Library branch.
3. On January 30, 2018, I was working as a Senior Library Assistant at the front desk at the East Hills Library.
4. While working the front desk, multiple library patrons complained about being solicited by a woman, Ms. Arnold, as they were getting out of their vehicles. The patrons reported that Ms. Arnold would approach their vehicles and follow them after they exited their vehicle in the parking lot.
5. After receiving several complaints, I contacted East Hills Mall Security to have them handle and assess the situation as I was unsure on whose property Ms. Arnold was located. I was informed by East Hills Mall security that the Mall does not

allow solicitors on its property, including individuals gathering signatures for any petition.

6. Sometime after East Hills Mall Security had arrived, a member of the mall security came into the library. Mall security notified me that Ms. Arnold was not cooperating, and they were going to notify the police.
7. There was no conspiracy between me and any other person to deprive Plaintiff of any of her Constitutional rights.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct. Further declarant sayeth not.

Executed on September 23, 2020.


Maryann Knorr